

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

STEPHEN McCOLLUM and	§	
SANDRA McCOLLUM,	§	
individually and as	§	
independent administrator	§	
of the Estate of LARRY	§	Civil Action
GENE McCOLLUM,	§	
	§	Number 4:14-CV-3253
	§	
Plaintiffs,	§	
	§	
vs.	§	
	§	
	§	
BRAD LIVINGSTON, JEFF	§	
PRINGLE, RICHARD CLARK,	§	
KAREN TATE, SANDREA	§	
SANDERS, ROBERT EASON,	§	
THE UNIVERSITY OF TEXAS	§	
MEDICAL BRANCH and THE	§	
TEXAS DEPARTMENT OF	§	
CRIMINAL JUSTICE,	§	
	§	
Defendants.	§	

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ORAL AND VIDEOTAPED DEPOSITION OF

CHARLES ADAMS, M.D.

MAY 18, 2016

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1 ORAL AND VIDEOTAPED DEPOSITION OF CHARLES  
2 ADAMS, M.D., produced as a witness at the instance  
3 of the PLAINTIFFS, and duly sworn, was taken in the  
4 above-styled and numbered cause on MAY 18, 2016,  
5 from 8:22 a.m. to 4:54 p.m., before Melody Reneé  
6 Campbell, CSR in and for the State of Texas,  
7 reported by method of machine shorthand, at the  
8 offices of the Attorney General, 300 West 15th  
9 Street, Austin, Texas, pursuant to Notice and Court  
10 Order and the Federal Rules of Civil Procedure.

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A P P E A R A N C E S

FOR THE PLAINTIFFS:

Mr. Jeff Edwards, Esq.  
Mr. Scott Medlock, Esq.  
The Edwards Law Firm  
1101 East Eleventh Street  
Austin, Texas 78702  
512.623.7727  
512.727.3365 (Fax)  
Jeff@edwards-law.com  
Scott@edwards-law.com

FOR THE UNIVERSITY OF TEXAS MEDICAL BRANCH:

Mr. Graig J. Alvarez, Esq.  
Ms. Kara Philbin, Esq.  
Fernelius Alvarez Simon  
1221 McKinney Street, Suite 3200  
Houston, Texas 77010  
713.654.1200  
GAlvarez@fa-lawfirm.com  
KPhilbin@f-alawfirm.com

-and-

Ms. J. Lee Haney, Esq.  
Assistant Attorney General  
Office of the Attorney General of Texas  
P.O. Box 12548, Capitol Station  
Austin, Texas 78711  
512.463.2080  
512.963.2109 (Fax)  
Lee.Haney@texasattorneygeneral.gov

OR THE DEFENDANTS BRAD LIVINGSTON, JEFF PRINGLE,  
RICHARD CLARK, KAREN TATE, SANDREA SANDERS, ROBERT  
EASON, THE TEXAS DEPARTMENT OF CRIMINAL JUSTICE:

Mr. Derek Kammerlocher, Esq.  
Mr. Phillip Boyd, Esq.  
Assistant Attorney General  
Post Office Box 12548  
Austin, Texas 78711  
512.463.2080  
512.936.2109  
Derek.Kammerlocher@texasattorneygeneral.gov  
Phillip.Boyd@texasattorneygeneral.gov

1 ALSO PRESENT:

Dr. Glenda Adams

2 Ms. Shanna Molanre

Ms. Ashley Palermo

3 Ms. Jennifer Osteen

Ms. Jennifer Daniel

4 Ms. Deborah M. Woltersdorf

Mr. Kevin J. Schaefer (Videographer)

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Q. (BY MR. EDWARDS) If the Texas Department of Criminal Justice is air-conditioning the bullets in the armory and not air-conditioning the housing areas where Mr. McCollum lived and suffered a heatstroke and eventually died, do you think that they're providing the same amount of protection from the heat?

A. Well, there's really nothing the bullets can do for themselves.

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10           Q.     (BY MR. EDWARDS) You mentioned a  
11 long-term strategy. You need a better long-term  
12 strategy than drink some water. Right?

13           A.     Well, I think --

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16           A.     There's other options. I'm not a  
17 mechanically inclined person. I don't know what  
18 those would be. But I threw out the fact that I  
19 think we need a long-term strategy for this kind of  
20 weather. Now, I don't know what it would be.

21           Q.     Fair enough. You're not mechanically  
22 inclined, you're not capable of designing a cooling  
23 system. Is what you're telling me?

24           A.     I promise you, I'm not.

25           Q.     But you are capable of knowing that it's

1 really hot and that -- right?

2 A. Yes.

3 Q. Okay. And so it would seem to me that the  
4 long-term strategy ought to be cooling the  
5 temperatures down.

6 A. And that probably could be done in a  
7 variety of ways, and I just don't know what they  
8 would be.

9 Q. Fair enough. But make no mistake, when  
10 you say long-term strategy, it needs to be to get  
11 the temperatures down so that this doesn't happen in  
12 the future. Right?

13 A. Well, that's certainly what I was  
14 implying, I think.

15 Q. Appreciate that. Given the obvious  
16 implication of that and what you're testifying  
17 today -- did anybody call you up from UTMB or TDCJ  
18 to say, let's work on a long-term strategy?

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20 A. No.

21 Q. (BY MR. EDWARDS) Have you ever been --  
22 have you ever been on kind of a long-term strategy  
23 planning committee with relation to cooling down the  
24 temperatures in any prison units?

25 A. No.